

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF MISSISSIPPI
(Northern Division)

UNITED STATES OF AMERICA,)
)
and the STATE OF MISSISSIPPI,)
)
Plaintiffs,)

v.)

THE CITY OF JACKSON, MISSISSIPPI,)
)
Defendant.)

Case No. 3:12-cv-790-HTW-LGI
(Clean Water Act Case)

UNITED STATES OF AMERICA,)
)
Plaintiff,)

v.)

THE CITY OF JACKSON, MISSISSIPPI,)
)
Defendant.)

Case No. 3:22-cv-00686-HTW-LGI
(Safe Drinking Water Case)

**STIPULATION FOR ORDER FOR
CONFIDENTIALITY OF
SETTLEMENT DISCUSSIONS WITH
SDWA INTERVENORS-PLAINTIFFS**

(Safe Drinking Water Act Case)

WHEREAS, on November 29, 2022, the United States initiated a civil action, Case No. 3:22-cv-00686-HTW-LGI, against the City of Jackson, Mississippi, alleging, among other things, violations of the Safe Drinking Water Act (“SDWA”), 42 U.S.C. § 300f *et seq.*;

WHEREAS, on March 18, 2024, the Court orally granted the Motion for Leave to Intervene in the SDWA case, filed by the Mississippi Poor People’s Campaign and People’s Advocacy Institute (referred to collectively herein as the “SDWA Intervenors-Plaintiffs”) as to certain SDWA claims alleged in the United States’ Complaint against the City of Jackson, Mississippi, and on March 20, 2024, entered its written order granting the requested intervention [Dkt. 102];

WHEREAS, the undersigned agree that maintaining the confidentiality of Settlement Communications (as defined in the proposed Order on Confidentiality of Settlement Discussions with SDWA Intervenors-Plaintiffs (“Order”)) would generally facilitate the free exchange of information, the expression of unvarnished opinions, and enhance the likelihood of a successful outcome in settlement discussions regarding the Subject Claims (as defined in the proposed Order);

WHEREAS, the undersigned wish to provide for appropriate protection covering any privilege that could be asserted and the confidentiality of exchanges occurring during the course of such discussions;

IT IS HEREBY STIPULATED AND AGREED by the undersigned that the proposed Order for Confidentiality of Settlement Discussions with SDWA Intervenors-Plaintiffs, which is being submitted simultaneously herewith, should be entered:

**Signature Page for Stipulation for Order for Confidentiality of Settlement
Discussions with SDWA Intervenor-Plaintiffs in
United States v. City of Jackson, Case No. 3:22-cv-00686-HTW-LGI (SDWA Case)**

FOR THE UNITED STATES OF AMERICA:

TODD KIM
Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice

Dated: J u n e 11 , 2024

KARL FINGERHOOD

Digitally signed by KARL
FINGERHOOD
Date: 2024.06.11 12:07:23 -04'00'

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Discussions with SDWA Intervenor-Plaintiffs in
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FOR THE CITY OF JACKSON, MISSISSIPPI:

DREW MARTIN (MS Bar. No. 101045)
City Attorney
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Dated: June 6, 2024

/s/ Terry Williamson (with permission by KF)
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Discussions with SDWA Intervenors-Plaintiffs in
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FOR THE MISSISSIPPI STATE DEPARTMENT OF HEALTH:

Dated: June 7, 2024

/s/ Christin Williams (with permission by KF)
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FOR THE INTERIM THIRD-PARTY MANAGER:



Dated:

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SDWA Intervenor-Plaintiffs in
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SIGNATURE PAGES FOR INTERVENORS:

Dated: May 31, 2024

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